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1516-CV04545 - KATIE MOORE V KANSAS CITY PUBLIC SCHOOLS, ET AL (E-CASE)

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04/17/2015

Notice of Service

Return of Service; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

Corporation Served

Document ID - 15-SMCC-3575; Served To - GREEN, DR. R. STEPHEN; Server - ; Served Date - 15-APR-15; Served Time - 11:55:00; Service Type - Special Process Server; Reason Description - Served; Service Text - Served to Amy Stouall - Legal

04/13/2015

Note to Clerk eFiling

Filed By: ASHLEY LYNN RICKET

Correspondence Filed

Letter to Clerk of Circuit Court; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

Correspondence Sent

Letter to Attorney Regarding Service

Order - Special Process Server

04/10/2015

Motion Special Process Server

Motion for Approval and Appointment of Private Process Server; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

04/09/2015

Summons Issued-Circuit

Document ID: 15-SMCC-3575, for GREEN, DR. R. STEPHEN.

Order - Special Process Server

04/07/2015

Note to Clerk eFiling

Filed By: ASHLEY LYNN RICKET

Motion Special Process Server

Motion for Approval and Appointment of Private Process Server; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

Request for Alias Summons

Request for Alias Summons for Defendant Green; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET

04/06/2015

Summons Personally Served

EXHIBIT A

Document ID - 15-SMOS-330; Served To - RICHARDSON, EDWIN; Server - ; Served Date - 31-MAR-15; Served Time - 10:25:00; Service Type - Sheriff Department; Reason Description - Served

☐ **Notice of Service**

Certificate of Service of Process on Edwin Richardson; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

☐ **Summons Returned Non-Est**

Document ID - 15-SMCC-2126; Served To - GREEN, DR. R. STEPHEN; Server - RIEAD, MICHEAL W.; Served Date - 02-APR-15; Served Time - 23:59:00; Service Type - Civil Process Server; Reason Description - Not In When Service Attempted

04/02/2015

☐ **Summons Personally Served**

Document ID - 15-SMCC-2127; Served To - BILLUPS, CECIL ANNETTE; Server - HALL, BENNY J; Served Date - 30-MAR-15; Served Time - 10:34:00; Service Type - Civil Process Server; Reason Description - Served

☐ **Family Member/Roommate Served**

Document ID - 15-SMCC-2130; Served To - COODY, ALICE; Server - HALL, BENNY J; Served Date - 30-MAR-15; Served Time - 11:35:00; Service Type - Civil Process Server; Reason Description - Served; Service Text - LEFT WITH ILSAN STAYTON /SON

☐ **Summons Personally Served**

Document ID - 15-SMCC-2125; Served To - SOUTHWEST EARLY COLLEGE CAMPUS,; Server - HALL, BENNY J; Served Date - 30-MAR-15; Served Time - 10:35:00; Service Type - Civil Process Server; Reason Description - Served

03/23/2015

☐ **Corporation Served**

Document ID - 15-SMCC-2124; Served To - KANSAS CITY PUBLIC SCHOOLS,; Server - RIEAD, MICHEAL W.; Served Date - 20-MAR-15; Served Time - 10:10:00; Service Type - Civil Process Server; Reason Description - Served; Service Text - LEFT WITH SHANA LONG/ SENIOR STAFF ATTORNEY OFFICER

☐ **Summons Issued-Circuit**

Document ID: 15-SMOS-330, for RICHARDSON, EDWIN.

03/20/2015

☐ **Note to Clerk eFiling**

Filed By: ASHLEY LYNN RICKET

☐ **Alias Summons Requested**

Letter to Clerk re out of county service by Otter Tail County Sheriff; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

☐ **Correspondence Sent**

Return letter to atty.

03/19/2015

☐ **Request Filed**

Request for Alias Summons - Edwin Richardson; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

☐ **Summons Returned Non-Est**

Document ID - 15-SMOS-253; Served To - RICHARDSON, EDWIN; Server - ; Served Date - 13-MAR-15; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Non-est; Service Text - Non Est - Unable to locate

☐ **Note to Clerk eFiling**

Filed By: ASHLEY LYNN RICKET

☐ **Notice of Service**

Sheriff s Return - Non est - Edwin Richardson; Electronic Filing Certificate of Service.
Filed By: ASHLEY LYNN RICKET
On Behalf Of: KATIE MOORE, D. S.

03/05/2015

☐ **Summons Issued-Circuit**

	Document ID: 15-SMOS-253, for RICHARDSON, EDWIN.
03/04/2015	**Correspondence Sent** Letter to Attorney Regarding Service
03/03/2015	**Note to Clerk eFiling** **Filed By:** ASHLEY LYNN RICKET
	Alias Summons Requested Request for Alias Summons; Electronic Filing Certificate of Service. **Filed By:** ASHLEY LYNN RICKET **On Behalf Of:** KATIE MOORE, D. S.
	Summons Issued-Circuit Document ID: 15-SMCC-2130, for COODY, ALICE.
	Summons Issued-Circuit Document ID: 15-SMCC-2127, for BILLUPS, CECIL ANNETTE.
	Summons Issued-Circuit Document ID: 15-SMCC-2126, for GREEN, DR. R. STEPHEN.
	Summons Issued-Circuit Document ID: 15-SMCC-2125, for SOUTHWEST EARLY COLLEGE CAMPUS,.
	Summons Issued-Circuit Document ID: 15-SMCC-2124, for KANSAS CITY PUBLIC SCHOOLS,.
	Order Appt Next of Friend
	Note to Clerk eFiling **Filed By:** ASHLEY LYNN RICKET
	Proposed Order Filed Order Appointing Next Friend; Electronic Filing Certificate of Service. **Filed By:** ASHLEY LYNN RICKET **On Behalf Of:** KATIE MOORE, D. S.
03/02/2015	**Correspondence Sent**
	Case Mgmt Conf Scheduled **Scheduled For:** 07/13/2015; 9:00 AM ; KEVIN DUANE HARRELL; Jackson - Kansas City
02/27/2015	**Consent to Appt Next Friend**
	Request for Jury Trial Filed
	Judge Assigned
	Filing Info Sheet eFiling **Filed By:** ASHLEY LYNN RICKET
	Motion to Appoint Next Friend Application for Appointment of Next Friend; Exhibit A - Consent to Serve as Next Friend. **Filed By:** ASHLEY LYNN RICKET **On Behalf Of:** KATIE MOORE
	Pet Filed in Circuit Ct Petition for Damages.

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

KATIE MOORE, as Next Friend
on behalf of D.S., a minor,
437 E. Gregory Boulevard,
Kansas City, MO 64131,

Plaintiff,

v.

KANSAS CITY PUBLIC SCHOOLS, also known as the Kansas City Public School District,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

SOUTHWEST EARLY COLLEGE CAMPUS, also known as Southwest High School,
SERVE:
Archie Brown, Principal,
6512 Wornall Road,
Kansas City, MO 64113,

and

DR. R. STEPHEN GREEN, individually and as Superintendent of Kansas City Public Schools,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

DR. EDWIN RICHARDSON, individually and as Principal of Southwest Early College

Case No.__________________

Div.____________________

JURY TRIAL DEMANDED

Campus,
SERVE:
33630 County Highway 1,
Underwood, MN 56586,

and

CECIL ANNETTE BILLUPS, individually and as a Special Education Teacher at Southwest Early College Campus,
SERVE:
8602 Elm Avenue,
Raytown, MO 64138,

and

ALICE COODY, individually and as a Special Education Teacher at Southwest Early College Campus,
SERVE:
822 E. 93rd Terrace, Apt. 322,
Kansas City, MO 64131,

Defendants.

PETITION FOR DAMAGES

Plaintiff, Katie Moore, as Next Friend on behalf of D.S, a minor, through her undersigned counsel, states the following for her causes of action against Defendants Kansas City Public Schools, Southwest Early College Campus, Dr. R. Stephen Green individually and as Superintendent of Kansas City Public Schools, and Dr. Edwin Richardson individually and as Principal of Southwest Early College Campus, Cecil Annette Billups individually and as a Special Education Teacher at Southwest Early College Campus, and Alice Coody individually and as a Special Education Paraprofessional at Southwest Early College Campus:

PLAINTIFF

1. Plaintiff Katie Moore is an individual over the age of eighteen (18) residing in Kansas City, Missouri, and is the court-appointed Next Friend on behalf of D.S., a minor.

2. D.S. is a minor, whose date of birth is May 22, 1999, and brings this cause of action by and through her court appointed Next Friend, Plaintiff Katie Moore, and is and was at all times relevant a student within the Kansas City Public Schools system in Missouri.

DEFENDANTS

3. Defendant Kansas City Public Schools (hereinafter "KCPS"), also known or referred to as the Kansas City Public School District, is and was at all times relevant a duly organized public school district under Missouri statutes located within Jackson County, Missouri within the geographical area encompassed by the Western District of Missouri, who may be served at the address identified above in the caption, and at all times relevant, and who is a recipient of federal financial assistance.

4. At all times relevant hereto, the KCPS was acting by and through its agents, servants, and/or employees, actual or ostensible, including, but not limited to Defendants Dr. R. Stephen Green and Dr. Edwin Richardson, as well as Simone Evette Chambers, Robert Lee, Megan Cunningham, Cecil Annette Billups, Alice Coody, Carol Dagget, Daryl Kearney, Clarasue Horning, Randa Delp, Dustin Haygood, Erin B. Dragoo, Cary Lammers, Officer D. Ross, and Cristopher James Drake, each of whom

were acting within the course and scope of their employment with KCPS. KCPS and its agents, servants, and/or employees are recipients of Federal Funds.

5. Defendant Southwest Early College Campus (hereinafter "SWECC"), also known or referred to as Southwest High School, is and was at all times relevant a public school within Defendant KCPS located within Jackson County, Missouri within the geographical area encompassed by the Western District of Missouri, who may be served at the address identified above in the caption, and at all times relevant, a recipient of federal financial assistance.

6. Defendant Dr. R. Stephen Green (hereinafter "Dr. Green") is an individual residing in Kansas City, Missouri, and was at all times relevant, the Superintendent, agent, representative, and employee of Defendant KCPS, who may be served at the address identified above in the caption, and whose acts and/or omissions were done both individually and within the course and scope of his employment and/or agency as Superintendent.

7. Defendant Dr. Edwin Richardson (hereinafter "Richardson") is an individual residing in Underwood, Otter Tail County, Minnesota, who was at all times relevant, the Principal, agent, representative, and employee of Defendant KCPS, who may be served at the address identified above in the caption, and whose acts and/or omissions were done both individually and within the course and scope of his employment and/or agency as Principal.

8. Defendant Cecil Annette Billups (hereinafter "Billups") is an individual residing in Raytown, Jackson County, Missouri, and was at all times relevant, a special

education teacher, agent, representative, and employee of Defendant KCPS, who may be served at the address identified above in the caption, and whose acts and/or omissions were done both individually and within the course and scope of her employment and/or agency as a special education teacher.

9. Defendant Alice Coody (hereinafter "Coody") is an individual residing in Kansas City, Jackson County, Missouri, and was at all times relevant, a special education paraprofessional, agent, representative, and employee of Defendant KCPS, who may be served at the address identified above in the caption, and whose acts and/or omissions were done both individually and within the course and scope of her employment and/or agency as a special education paraprofessional.

10. At all material times Defendants were responsible for the care of children of KCPS, including minor D.S.

11. At all material times Defendants had reasonable cause to suspect that children, including D.S., had been or may be subjected to abuse or neglect or observed children, including D.S., being subjected to conditions or circumstances which would reasonably result in abuse or neglect.

12. The Defendants' liability insurance policy provides coverage for the liabilities alleged in this Petition for Damages.

JURISDICTION & VENUE

13. Jurisdiction and venue is proper with this Court in that the alleged acts and/or omissions and injuries as set forth in this Petition occurred within Jackson County, Missouri.

GENERAL ALLEGATIONS

14. D.S. is currently, and was during the relevant 2013-2014 school year, a student in the KCPS attending Defendant SWECC.

15. The subject SWECC premises has four floors and a capacity for up to 2,500 students, and at all times relevant, had approximately 600 students regularly attending school upon the premises.

16. Due to the large size of the premises and the fact that the school was at approximately ¼ of its student capacity, there are portions of the premises that are not frequently utilized and deemed "secure," meaning that students are not permitted to be in those areas of the SWECC premises.

17. Classes are not attended in the "secure" portions of SWECC's premises and the "secure" areas lack adult supervision and/or security staff.

18. Earlier in the 2013-2014 school year, in or about August 2013, a female student reported that she had been raped by two other students and that a set of doors leading to a "secure" part of the SWECC premises had been breached, allowing the assailants access to the "secure" area of the building where the sexual assault was committed.

19. This incident, along with complaints of the faultily "secured" doors, was reported to Defendants, as well as the Kansas City Police Department, which conducted an investigation of the incident.

20. As a result of the August 2013 sexual assault, Defendant KCPS committed to take steps to protect the students, including but not limited to:

a. Increase safety awareness training for employees through their SafeSchools web-based training program;

b. Instituting weekly safety reviews at each school;

c. Immediately review the condition of all doors and locks to ensure proper operation. An emphasis will be placed on secure staff work areas and closed classrooms, and restricting access to isolated building areas;

d. Upgrade closed-circuit security camera systems to provide additional coverage at schools; and

e. Reinforcing adult supervision of students during lunch, recess, and passing periods.

21. KCPS failed to follow their policies and rules enumerated in Paragraph 20, above, especially with regard to ensuring doors providing ingress and egress to "secure" areas upon the SWECC premises were properly locked and secured, as well as increasing security staff.

22. Beginning at least in 2013, Defendants KCPS, SWECC, and Green were notified by Defendant Richardson that there were serious security issues with the SWECC premises and that there was a dangerous condition of the public entity SWECC's property, including but not limited to the following physical defects upon the SWECC premises:

a. An inadequate number of properly functioning security cameras for the size of the SWECC premises and the amount of students attending school upon the SWECC premises;

b. Faulty and/or missing locks on several doors providing ingress and egress to "secure" areas of the SWECC premises;

c. An inadequate number of security personnel for the size of the SWECC premises and the amount of students attending school upon the SWECC premises;

d. Lack of proper procedures for securing hallways and "secure" areas;

e. Lack of proper procedures for clearing hallways of students during "passing periods" between classes, as well as for students loitering in the hallways during classes;

f. Lack of procedures for ensuring the proper function of the security camera system;

g. KCPS's lack of procedures to remove or to deal with students who exhibited violence or threatened violence against other students and KCPS and SWECC staff;

h. Lack of proper lighting upon SWECC premises; and

i. Failure to address and resolve issues with the SWECC phone system, which was described as "unreliable."

23. Defendants took no steps to address, correct, or otherwise mitigate the foregoing physical defects and security deficiencies upon the SWECC premises.

24. D.S. suffers from significant intellectual and learning disabilities with an IQ of 51, and was, at all times relevant, in special education classes at Defendant SWECC, and SWECC is in charge of D.S.'s care, custody, and control during the school day.

25. D.S. often talks in baby talk, has trouble perceiving danger, and when D.S. becomes frustrated she will avoid the situation by attempting to wander off.

26. D.S.'s disability has made her a target for relentless bullying, discrimination, and harassment by other students, which consisted of ongoing, severe, and brutal physical and emotional abuse, including sexual harassment by her follow students, with such examples including but not limited to fellow SWECC students:

a. yelling at D.S. and telling her she was ugly;

b. putting their hands under D.S.'s shirt, touching her "boobs"; and

c. slapping D.S. in the face.

27. D.S. complained to her teachers about the bullying, discrimination, and harassment, but Defendants failed to take sufficient measures to correct these issues.

28. Further, due to D.S.'s disability, she has an Individual Education Plan ("IEP") that was put into place by SWECC upon D.S.'s entry into the KCPS system.

29. As noted in D.S.'s IEP, Defendants knew or should have known D.S. had a tendency to wander, which contributed to her poor class attendance, and that D.S. was

susceptible to suggestion due to her significant intellectual and learning disabilities and low IQ.

30. D.S.'s IEP specifically stated that D.S.'s attendance required improvement, but failed to set forth any suggestions or steps to implement with regard to accomplishing this goal.

31. During the relevant 2013-2014 school year, Defendant Green was the Superintendent of KCPS and Defendant Richardson was the Principal at SWECC.

32. In March of 2014, D.S. was sexually assaulted at least three times by the same student at SWECC under the same or similar circumstances as the August 2013 rape, namely, there was a lack of adult supervision and/or security staff in the "secure" area where the assaults occurred, and her assailant forced her into a "secure" area on the SWECC premises to commit the sexual assaults.

33. D.S. did not report the March 2014 incidents because the student had threatened to kill her if she told anyone what had occurred.

34. On April 1, 2014, one of the para-professionals assigned to D.S.'s special education classrooms, Alice Coody, saw D.S. leaving the lunchroom at approximately 10:44 a.m., heading down a hallway prior to lunch period being over.

35. Coody reported D.S. as missing to the Special Education Process Coordinator, Megan Cunningham, who in turn contacted D.S.'s teacher, Ms. Billups, to confirm D.S. was missing and was not present in her 5th Period class and who did not return to classes the remainder of the day on April 1, 2014.

36. SWECC's security staff made no record of D.S. being reported missing on April 1, 2014, and on previous occasions when D.S. has wandered off during the school day, security staff has never managed to locate and return D.S. to class.

37. D.S. was never located by any of Defendant SWECC's staff on April 1, 2014.

38. On April 1, 2014, sometime between 10:44 a.m. and 2:00 p.m., two SWECC students (D.W., a male and C.G., a female) pulled D.S. into a hallway and through a set of unsecured doors into a "secure" area upon the SWECC premises, where D.S. sexually assaulted more than once by D.W. while C.G. acted as "look-out."

39. At approximately 2:00 a.m. on April 2, 2014, D.S. complained to her parents of severe vaginal and anal pain.

40. D.S. was taken to Children's Mercy Hospital, where it was medically confirmed that D.S. was the victim of vaginal and anal rape.

41. Additionally, since the sexual assaults, D.S. has been diagnosed with numerous serious physical, social, mental, and emotional disorders that have further decreased D.S.'s ability to function independently and age-appropriately.

42. The combination of physical defects with SWECC's security systems; a culture of bullying, abuse, discrimination and sexual harassment among SWECC's students; and lack supervision by SWECC's staff resulted in an investigation by Social Service's Children's Division, which concluded that D.S.'s sexual assault constituted "an institutional failure on the part of the district for this to be an on-going, daily occurrence."

COUNT I
PREMISE LIABILITY - DANGEROUS CONDITION OF PROPERTY
(Plaintiff v. Defendants KCPS and SWECC)

43. Plaintiff hereby incorporates the allegations set forth in foregoing paragraphs as though fully set forth herein.

44. At all times relevant, Defendants exposed their students to dangerous physical defects and conditions on the SWECC premises, more particularly identified in above.

45. During 2013-2014 school year, the SWECC's premises were kept in an unsafe and dangerous condition, including but not limited to the physical defects with missing or broken locks on doors providing ingress and egress to "secure" areas, including the areas where D.S. was sexually assaulted.

46. These isolated "secure" areas were not properly secured and locked, rendering the premises unsafe and dangerous to the students, including D.S.

47. As the August 2013 sexual assault occurred in a "secure" area of the school and D.S. was later sexually assaulted in March and April 2014 in a "secure" area of the school, Defendants were on notice that the premises were dangerous and unsafe due to failure of proper locks to "secure" areas, and yet, failed to take any measures to properly secure the "secure" areas.

48. Defendants had a duty to protect students, including D.S., from foreseeable injury as a result of the unsafe physical conditions located upon its premises.

49. As a result of these unsafe and dangerous conditions of the property, D.S. was repeatedly sexually assaulted in a "secure" area of the school.

50. Defendants had the ministerial authority, right, and power to control access to "secure" areas of the school by ensuring that the locks on the doors functioned properly, and the doors to "secure" areas were locked.

51. Defendants knew or had reason to know that the locks on doors controlling access to the "secure" areas had been compromised and that students had broken the locks, learned to disable the locks, and would gain unsupervised access to the "secure" areas during class periods.

52. Defendants had ample time between the August 2013 assault and D.S.'s assaults in March 2014 to exercise their ministerial duties to repair and/or replace the locks on the doors to "secure" areas, and Defendants' failed to exercise ministerial control or take appropriate action to prevent students from gaining unsupervised access to the "secure" areas where the sexual assaults occurred.

53. The Defendants' property was in dangerous condition at the time of the injuries to minor D. S.

54. D.S.'s injuries directly resulted from the dangerous condition of the Defendants' property.

55. The dangerous condition of the Defendants' property created a reasonably foreseeable risk of assault to the students of SWECC, including minor D.S.

56. The negligent acts or omissions of the Defendants' employees acting within the course and scope of their employment for Defendants created the dangerous condition.

57. The Defendants had actual or constructive notice of the dangerous condition in sufficient time prior to the injuries to D.S. to have taken measures to protect D.S. against the dangerous condition.

58. As a direct and proximate result of the Defendants' breach of duty, D.S. was a victim of brutal sexual assault, and has suffered and will continue to suffer severe mental, emotional, and physical harm, including but not limited to emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, loss of enjoyment of life, and other economic damages including but not limited to expenses for past and future medical and psychological treatment, therapy and counseling.

59. By reason of the foregoing, Plaintiff has been damaged and is entitled to fair and reasonable compensation.

60. Defendants' conduct which caused these damages was outrageous and constituted gross negligence in that Defendants knew or in the exercise of ordinary care should have known that their conduct created a high probability of injury; Defendants thereby demonstrated a conscious or reckless disregard for the rights of D.S., and other students who are similarly situated, justifying the imposition of punitive damages.

WHEREFORE, Plaintiff prays for an award of actual damages against Defendants, in an amount to be determined by the jury, for punitive damages, together with interest and costs of suit, and for such other relief as is just and proper.

COUNT II
NEGLIGENCE – NEGLIGENT SUPERVISION/ BREACH OF MINISTERIAL DUTIES
(Plaintiff v. All Defendants)

61. Plaintiff hereby incorporates the allegations set forth in the foregoing paragraphs, as though fully set forth herein.

62. While upon the SWECC premises, during the school day, D.S. was under the care, custody and control of Defendants.

63. At all times relevant, the students who abused and harassed D.S. were also under the care, custody and control of Defendants during the school day while on SWECC premises.

64. Defendants knew or should have known that a culture of bullying, discrimination, sexual assault, and sexual harassment existed at SWECC because Defendants:

a. Knew or should have known that on August 29, 2013, a sexual assault occurred at SWECC in a "secure" area;

b. Knew or should have known that D.S. was the victim of daily abuse, sexual harassment, bullying, and torment by her classmates at SWECC for months leading up to her sexual assaults;

c. Knew or should have known that D.S., due to her disability, was vulnerable to wandering and suggestion by fellow students and failed to address these tendencies in D.S.'s IEP; and

d. Knew or should have known of other instances of sexual harassment and bullying as yet unknown to Plaintiff but which Plaintiff expect will come to light during the course of discovery in this case.

65. At all times in which D.S. was a student at SWECC, Defendants had a ministerial duty to possess and use the same degree of care ordinarily used by reasonable and/or careful educational authorities to properly supervise its students and to protect D.S. from the foreseeable and unreasonable risks of harm posed by students under Defendants' care, custody and control.

66. The Defendants and their agents, servants and/or employees had a duty to possess and use that degree of skill and learning ordinarily used in the same or similar circumstances by members of their profession in the care and supervision of D.S.

67. At all material times Defendants were responsible for the care of children, including D.S., in the State of Missouri, and thus the Defendants were had a ministerial duty to comply with the mandatory rules, regulations, city ordinances, state statutes, and policies, including but not limited to those promulgated by the Missouri Department of Education, the Kansas City Public Schools, Missouri Division of Social Services, Missouri Public Schools.

68. Defendants and their employees, agents and/or servants of the said defendants breached their ministerial duty to D.S. and violated rules, regulations, city ordinances, Missouri state statutes, and policies governing Defendants.

69. D.S. was a member of the class of persons intended to be protected by the enactment of the aforementioned rules, regulations, city ordinances, state statutes, and policies.

70. Defendants had a ministerial duty pursuant to Missouri Revised Statute § 210.115.1 to immediately report to the division that D.S. and other children was or may be subject to abuse or neglect, or observed D.S. and other children being subjected to conditions or circumstances which would reasonably result in abuse or neglect pursuant to RSMo. § 210.115.1.

71. At the time of and leading up to D.S. being sexually assaulted, Defendants knew or should have known that readily identifiable students within the Defendants' care, custody and control were sexually harassing, abusing, discriminating, and otherwise bullying D.S. both physically and emotionally.

72. Despite that knowledge, Defendants failed to exercise ministerial duties in addressing the bullying, discrimination, and harassment to protect D.S. from bullies and harassers or to discipline or otherwise discourage her harassers.

73. Defendants breached their ministerial duty to properly supervise their students and to intervene effectively to stop the abuse D.S. was suffering at the hand of her peers by:

a. Negligently failed to immediately report to the division that D.S. and other children was or may be subject to abuse or neglect, or observed D.S. and other children being subjected to conditions or circumstances which would reasonably result in abuse or neglect pursuant to RSMo. § 210.115.1;

b. Negligently and carelessly failing to monitor the SWECC premises for sexual, physical, and verbal abuse;

c. Negligently and carelessly failing to timely recognize the severity of the abuse against D.S.;

d. Negligently and carelessly failing to properly address the abuse against D.S. per D.S.'s complaints to SWECC staff as well as addressing these issues in D.S.'s IEP;

e. Negligently and carelessly failing to ensure that D.S. was put in a safe learning environment;

f. Negligently and carelessly failing to supervise the students who were abusing D.S.;

g. Negligently and carelessly failing to comply with Defendants' own bullying, sexual harassment, and assault policies, if such existed;

h. Negligently and carelessly failing to discipline or otherwise discourage the behavior of students who were physically and verbally abusing D.S.;

i. Negligently and carelessly committing acts and omissions that encouraged continual abuse against D.S.;

j. Negligently and carelessly failing to address all of the security concerns more particularly identified in Paragraphs 20 and 22, above; and

k. Negligently and carelessly committing other acts and omissions as yet unknown to Plaintiff, but which Plaintiff expect will come to light during the discovery process.

74. As a direct and proximate result of Defendants' negligence, D.S. was exposed to foreseeable and known risks of severe injury; was sexually assaulted; and was severely injured.

75. D.S. has incurred necessary and reasonable medical expenses, suffered physical pain, mental anguish, emotional distress, and experienced other economic hardships, all as a direct and proximate result of Defendants' negligence.

76. By reason of the foregoing, Plaintiff has been damaged and is entitled to fair and reasonable compensation.

77. Defendants' conduct which caused these damages was outrageous and constituted gross negligence in that Defendants knew or in the exercise of ordinary care should have known that their conduct created a high probability of injury; Defendants thereby demonstrated a conscious or reckless disregard for the rights of D.S., and other students who are similarly situated, justifying the imposition of punitive damages.

WHEREFORE, Plaintiff prays for an award of actual damages against Defendants, in an amount to be determined by the jury, for punitive damages, together with interest and costs of suit, and for such other relief as is just and proper.

DEMAND FOR JURY TRIAL OF ALL ISSUES

Plaintiff in the above-entitled cause demands a trial by jury.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
tim@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

KATIE MOORE, as Next Friend on behalf of D.S., a minor, 437 E. Gregory Boulevard, Kansas City, MO 64131, Plaintiff,	Case No._________________
v.	Div.____________________
KANSAS CITY PUBLIC SCHOOLS, also known as the Kansas City Public School District, **SERVE:** Amy Stovall, Legal Services Dept., 1211 McGee, Kansas City, MO 64106,	**JURY TRIAL DEMANDED**
and	
SOUTHWEST EARLY COLLEGE CAMPUS, also known as Southwest High School, **SERVE:** Archie Brown, Principal, 6512 Wornall Road, Kansas City, MO 64113,	
and	
DR. R. STEPHEN GREEN, individually and as Superintendent of Kansas City Public Schools, **SERVE:** Amy Stovall, Legal Services Dept., 1211 McGee, Kansas City, MO 64106,	
and	
DR. EDWIN RICHARDSON, individually and as Principal of Southwest Early College	

Campus,)
SERVE:)
33630 County Highway 1,)
Underwood, MN 56586,)
)
and)
)
CECIL ANNETTE BILLUPS, individually)
and as a Special Education Teacher at)
Southwest Early College Campus,)
SERVE:)
8602 Elm Avenue,)
Raytown, MO 64138,)
)
and)
)
ALICE COODY, individually and)
as a Special Education Teacher at)
Southwest Early College Campus,)
SERVE:)
822 E. 93rd Terrace, Apt. 322,)
Kansas City, MO 64131,)
)
Defendants.)

APPLICATION FOR APPOINTMENT OF NEXT FRIEND

COMES NOW, Petitioner, Katie Moore, and moves the court for an Order appointing her as the Next Friend of D.S., a Minor, and in support thereof, states the following:

1. D.S. is a minor, whose date of birth is May 22, 1999.

2. Sharece Shelby and Harold Shelby reside with minor D.S. at 7041 Askew, Kansas City, MO 64132.

3. Sharece Shelby and Harold Shelby have been notified of this Application for Appointment of Next Friend pursuant to Rule 52.02(c) and have no objection to this appointment.

4. Petitioner Katie Moore seeks her appointment as Next Friend for the minor child for the purpose of filing and maintaining a lawsuit against the above-captioned defendants.

5. Petitioner hereby submits as Exhibit A her signed Consent to serve as Next Friend in this matter.

WHEREFORE, Petitioner respectfully requests an Order from the Court appointing Katie Moore as the Next Friend on behalf of the minor child, D.S.

DOLLAR BURNS & BECKER, L.C.

____

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
tim@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ **AT KANSAS CITY** ☐ AT INDEPENDENCE

RE: KATIE MOORE V KANSAS CITY PUBLIC SCHOOLS, ET AL
CASE NO: 1516-CV04545

TO: ASHLEY LYNN RICKET
DOLLAR, BURNS & BECKER
1100 MAIN ST, SUITE 2600
KANSAS CITY, MO 64105

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on FEBRUARY 27, 2015. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE
- ☒ **Additional service instructions are needed.**
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)
- ☐ Need Circuit Court Form 4

RULE 5.6 – COLLECTIONS OF DEPOSIT
- ☐ No fee, or incorrect fee, received; fee required is $______.
- ☐ Insufficient Filing Fee; Please Remit $______
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1
- ☐ Need Circuit Court Form 17

RULE 68.7 – VITAL STATISTICS REPORT
- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT – FOREIGN JUDGMENT
- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS
- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER: To further process your case please submit *"specific service instructions"* on how you want each defendant served. Also please submit a Proposed Order for Appointment of Next Friend for the courts approval.**

☒ **Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.**

☐ The private process server listed is not on our approved list.

☐ Execution in effect. Return date ________. Request may be resubmitted within one week prior to return date.

☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed MARCH 2, 2015 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

MARCH 2, 2015
Date

By [signature]
Patricia McIntosh 816-881-3906
Deputy Court Administrator
☒ **415 East 12th St., Kansas City, Missouri 64106**
☐ 308 W. Kansas, Independence, Missouri 64050

CONSENT TO SERVE AS NEXT FRIEND

The undersigned, Katie Moore, Petitioner in the above-entitled action, hereby consents to her appointment as Next Friend on behalf of the minor child, D.S., for the purpose of filing and maintaining the above-captioned lawsuit.

Dated this 23 day of February, 2015.

Katie Moore

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

KATIE MOORE

PLAINTIFF(S), **CASE NO. 1516-CV04545**
VS. **DIVISION 18**

KANSAS CITY PUBLIC SCHOOLS ET AL

DEFENDANT(S),

NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE AND ORDER FOR MEDIATION

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **KEVIN DUANE HARRELL** on **13-JUL-2015** in **DIVISION 18** at **09:00 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16th Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16th Judicial Circuit web site at www.16thcircuit.org after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

a. A trial setting;

b. Expert Witness Disclosure Cutoff Date;

c. A schedule for the orderly preparation of the case for trial;

d. Any issues which require input or action by the Court;

e. The status of settlement negotiations.

MEDIATION

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case if filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

POLICIES/PROCEDURES

Please refer to the Court's web page www.16thcircuit.org for division policies and procedural information listed by each judge.

/S/ **KEVIN DUANE HARRELL**
KEVIN DUANE HARRELL**, Circuit Judge**

Certificate of Service

This is to certify that a copy of the foregoing was mailed postage pre-paid or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

Attorney for Plaintiff(s):
ASHLEY LYNN RICKET, DOLLAR, BURNS & BECKER, 1100 MAIN ST, SUITE 2600, KANSAS CITY, MO 64105

TIM EUGENE DOLLAR, DOLLAR BURNS & BECKER L C, 1100 MAIN STREET, SUITE 2600, KANSAS CITY, MO 64105

Defendant(s):
KANSAS CITY PUBLIC SCHOOLS,
SOUTHWEST EARLY COLLEGE CAMPUS,
DR. R. STEPHEN GREEN
EDWIN RICHARDSON
CECIL ANNETTE BILLUPS
ALICE COODY

Dated: 09-APR-2015

Jeffrey A. Eisenbeis
Court Administrator

DOLLAR BURNS & BECKER
TRIAL ATTORNEYS

1100 Main Street | Suite 2600 | Kansas City, Missouri 64105
www.dollar-law.com | O: 816.876.2600 FX: 816.221.8763 TOLL-FREE: 877.816.2600

ASHLEY L. RICKET
Attorney
ashley@dollar-law.com

Electronically Filed - Jackson - Kansas City - March 03, 2015 - 04:44 PM

March 3, 2015

Clerk of the Circuit Court
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64106

Re: Katie Moore, as Next Friend on behalf of D.S., a minor v. Kansas City Public Schools, also known as the Kansas City Public School District, et al.
Case No.: 1516-CV04545

Dear Sir/Madam:

Please consider this letter our written request for this Court to issue an **Alias Summons** as follows:

DR. EDWIN RICHARDSON
SERVE: **33630 County Highway 1**
Underwood, MN 56586

Thank you for your assistance with this request.

Sincerely,

Ashley L. Ricket
ALR/llj

{313230.DOC}

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS, Nature of Suit: CC Pers Injury-Other	Court Address: 415 E 12th KANSAS CITY, MO 64106

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ALICE COODY
individually and as a Special Education Teacher at
Southwest Early College Campus

SERVE:
822 E. 93RD TERRACE, APT. 322
KANSAS CITY, MO 64131

COURT SEAL OF
CIRCUIT COURT OF MISSOURI
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______________________ a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

______________________ (name) ______________________ (title).

☐ other ______________________.

Served at ______________________ (address)

in ______________ (County/City of St. Louis), MO, on ______________ (date) at ______________ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on ______________________ (date).

(Seal)

My commission expires: ______________ Date

______________ Notary Public

Sheriff's Fees

Summons	$
Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$ (______ miles @ $. ______ per mile)
Total	**$**

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS
ATTORNEY INFORMATION

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Circuit Court of Jackson County

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE **vs.**	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CECIL ANNETTE BILLUPS
Individually and as a Special Education Teacher at Southwest Early College Campus

SERVE:
8602 ELM AVENUE
RAYTOWN, MO 64138

COURT SEAL OF
CIRCUIT COURT OF MISSOURI
JACKSON COUNTY

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

______________________ (name) ______________________ (title).

☐ other ______________________.

Served at ______________________ (address)

in ______________ (County/City of St. Louis), MO, on ______________ (date) at ______________ (time).

____
Printed Name of Sheriff or Server

____
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on ______________________ (date).

(Seal)

My commission expires: ______________ Date ______________ Notary Public

Sheriff's Fees

Summons	$______
Non Est	$______
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$______ (______ miles @ $.______ per mile)
Total	**$______**

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Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DR. R. STEPHEN GREEN
Alias:

SERVE: AMY STOVALL,
LEGAL SERVICES DEPT.
1211 MCGEE
KANSAS CITY, MO 64106

COURT SEAL OF

JACKSON COUNTY

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______________________ Clerk

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______________________ Printed Name of Sheriff or Server

______________________ Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on ______________________ (date).

My commission expires: ______________ Date ______________ Notary Public

Sheriff's Fees

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Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: SOUTHWEST EARLY COLLEGE CAMPUS, A/K/A SOUTHWEST HIGH SCHOOL

SERVE: ARCHIE BROWN, PRINCIPAL
6512 WORNALL ROAD
KANSAS CITY, MO 64113

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

JACKSON COUNTY

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Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

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The State of Missouri to: KANSAS CITY PUBLIC SCHOOLS, A/K/A THE KANSAS CITY PUBLIC SCHOOL DISTRICT

SERVE: AMY STOVALL
LEGAL SERVICES DEPARTMENT
1211 MCGEE
KANSAS CITY, MO 64106

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

JACKSON COUNTY

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______________________ (name) ______________________ (title).

☐ other ______________________.

Served at ______________________ (address)

in ______________________ (County/City of St. Louis), MO, on ______________________ (date) at ______________________ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

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Subscribed and sworn to before me on ______________________ (date).

(Seal)

My commission expires: ______________________ ______________________

Date

Notary Public

Sheriff's Fees

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Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$ (______ miles @ $.______ per mile)
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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

Electronically Filed - Jackson - Kansas City - March 03, 2015 - 08:54 AM

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

KATIE MOORE, as Next Friend
on behalf of D.S., a minor,
437 E. Gregory Boulevard,
Kansas City, MO 64131,

Plaintiff,

v.

KANSAS CITY PUBLIC SCHOOLS, also known as the Kansas City Public School District,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

SOUTHWEST EARLY COLLEGE CAMPUS, also known as Southwest High School,
SERVE:
Archie Brown, Principal,
6512 Wornall Road,
Kansas City, MO 64113,

and

DR. R. STEPHEN GREEN, individually and as Superintendent of Kansas City Public Schools,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

DR. EDWIN RICHARDSON, individually and as Principal of Southwest Early College

Case No. 1516-CV04545

Div. 18

JURY TRIAL DEMANDED

Campus,)
SERVE:)
Viking Elementary School,)
1 Viking Drive,)
Pelican Rapids, MN 56572,)

and)

CECIL ANNETTE BILLUPS, individually)
and as a Special Education Teacher at)
Southwest Early College Campus,)
SERVE:)
8602 Elm Avenue,)
Raytown, MO 64138,)

and)

ALICE COODY, individually and)
as a Special Education Teacher at)
Southwest Early College Campus,)
SERVE:)
822 E. 93rd Terrace, Apt. 322,)
Kansas City, MO 64131,)

Defendants.)

ORDER APPOINTING NEXT FRIEND

The Petitioner, Katie Moore, is hereby appointed as the Next Friend on behalf of the Minor, D.S. for the purpose of pursuing the above-entitled action.

Dated this _____ day of _____________, 2015.

____
Judge/Clerk

Electronically Filed - Jackson - Kansas City - March 03, 2015 - 08:54 AM

Electronically Filed - Jackson - Kansas City - March 03, 2015 - 08:54 AM

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

KATIE MOORE, as Next Friend
on behalf of D.S., a minor,
437 E. Gregory Boulevard,
Kansas City, MO 64131,

Plaintiff,

v.

KANSAS CITY PUBLIC SCHOOLS, also known as the Kansas City Public School District,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

SOUTHWEST EARLY COLLEGE CAMPUS, also known as Southwest High School,
SERVE:
Archie Brown, Principal,
6512 Wornall Road,
Kansas City, MO 64113,

and

DR. R. STEPHEN GREEN, individually and as Superintendent of Kansas City Public Schools,
SERVE:
Amy Stovall, Legal Services Dept.,
1211 McGee,
Kansas City, MO 64106,

and

DR. EDWIN RICHARDSON, individually and as Principal of Southwest Early College

Case No. 1516-CV04545

Div. 18

JURY TRIAL DEMANDED

Electronically Filed - Jackson - Kansas City - March 03, 2015 - 08:54 AM

Campus,
SERVE:
Viking Elementary School,
1 Viking Drive,
Pelican Rapids, MN 56572,

and

CECIL ANNETTE BILLUPS, individually and as a Special Education Teacher at Southwest Early College Campus,
SERVE:
8602 Elm Avenue,
Raytown, MO 64138,

and

ALICE COODY, individually and as a Special Education Teacher at Southwest Early College Campus,
SERVE:
822 E. 93rd Terrace, Apt. 322,
Kansas City, MO 64131,

Defendants.

ORDER APPOINTING NEXT FRIEND

The Petitioner, Katie Moore, is hereby appointed as the Next Friend on behalf of the Minor, D.S. for the purpose of pursuing the above-entitled action.

Dated this 3RD day of MARCH, 2015.

Patricia A. McIntosh
DEPUTY CLERK ADMINISTRATOR

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ **AT KANSAS CITY** ☐ AT INDEPENDENCE

RE: KATIE MOORE V KANSAS CITY PUBLIC SCHOOLS, ET AL
CASE NO: 1516-CV04545

TO: ASHLEY LYNN RICKET
DOLLAR, BURNS & BECKER
1100 MAIN ST, SUITE 2600
KANSAS CITY, MO 64105

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on March 3, 2015. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE
- ☐ Additional service instructions are needed.
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)
- ☐ Need Circuit Court Form 4

RULE 5.6 – COLLECTIONS OF DEPOSIT
- ☐ No fee, or incorrect fee, received; fee required is $______.
- ☐ Insufficient Filing Fee; Please Remit $______
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1
- ☐ Need Circuit Court Form 17

RULE 68.7 – VITAL STATISTICS REPORT
- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT – FOREIGN JUDGMENT
- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS
- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER: Please note that a summons for the defendant listed on your Request for Alias Summons, file stamped on March 3, 2015 at 4:44pm, was already issued on March 3, 2015 at 9:49am. A new summons cannot be generated until we received a Non Est service return on the current summons, or until the current summons expires (30 days from the issue date).**
- ☐ Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date ________. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed MARCH 4, 2015 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

MARCH 4, 2015
Date

By ____________________

Peggy Holley, 816-881-6491
Deputy Court Administrator
☒ **415 East 12th St., Kansas City, Missouri 64106**
☐ **308 W. Kansas, Independence, Missouri 64050**

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE **vs.**	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS, Nature of Suit: CC Pers Injury-Other	Court Address: 415 E 12th KANSAS CITY, MO 64106

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Principal of Southeast Early College Campus

SERVE:
33630 County Highway 1
UNDERWOOD, MN 56586

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

05-MAR-2015
Date

____
Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ________________ of ____________ County, __________ (state).
3. I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ________________, a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ________________ (name) ________________ (title).

☐ other (describe) ________________.

Served at ________________ (address)
in ____________ County, __________ (state), on __________ (date) at ________ (time).

________________ Printed Name of Sheriff or Server

________________ Signature of Sheriff or Server

Subscribed and Sworn To me before this ______ (day) _______ (month) _____ (year)

I am: (check one)
☐ the clerk of the court of which affiant is an officer.
☐ the judge of the court of which affiant is an officer.
☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

____
Signature and Title

Service Fees, if applicable

Summons	$__________
Non Est	$__________
Mileage	$__________ (_______ miles @ $ _____ per mile)
Total	**$__________**

See the following page for directions to clerk and to officer making return on service of summons.

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

SUMMONS/GARNISHMENT SERVICE PACKETS
ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

DOLLAR BURNS & BECKER LLC
TRIAL ATTORNEYS

1100 Main Street | Suite 2600 | Kansas City, Missouri 64105
www.dollar-law.com | O: 816.876.2600 FX: 816.221.8763 TOLL-FREE: 877.816.2600

ASHLEY L. RICKET
Attorney
ashley@dollar-law.com

Electronically Filed - Jackson - Kansas City - March 19, 2015 - 10:32 AM

March 19, 2015

Clerk of the Circuit Court
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64106

Re: Katie Moore, as Next Friend on behalf of D.S., a minor v. Kansas City Public Schools, also known as the Kansas City Public School District, et al.
Case No.: 1516-CV04545

Dear Sir/Madam:

Please consider this letter our written request for this Court to issue an **Alias Summons** as follows:

DR. EDWIN RICHARDSON
SERVE: Viking Elementary School (current place of employment)
1 Viking Drive
Pelican Rapids, MN 56572

Thank you for your assistance with this request.

Sincerely,

Ashley L. Ricket
ALR/llj

{315132.DOC }

Electronically Filed - Jackson - Kansas City - March 19, 2015 - 09:24 AM

STATE OF MINNESOTA)
) **ss.**
COUNTY OF OTTER TAIL)

CERTIFICATE OF
UNSERVED PROCESS
Court File #: 1516-CV04545

KATIE MOORE vs. **KANSAS CITY PUBLIC SCHOOLS**

I, Deputy Robert Huckeby, do hereby certify that on March 9, 2015, I received the following to serve on Dr. Edwin Richardson, ind & as Principal of Southwest Early College Campus

Summons w/Service Information-Attorney
Petition for Damages
Application for Appointment of Next Friend
Order Appointing Next Friend

The attached process is returned for the following reason(s)

Unable to locate - had phone contact with Jan Wilson (Edwin Richardson's step-daughter) who stated the Edwin Richardon that used to live at 33630 Co Hwy 1, Underwood, is deceased and never worked at Southwest Early College Campus.

Sheriff's Fees:

Service Fee	$ 25.00
Mileage	$ 19.80
Total	$ 44.80

Brian I. Schlueter, Sheriff
Otter Tail County Sheriff's Office
417 S Court St
Fergus Falls, MN 56537
218-998-8524

Dated: March 13, 2015

By: [signature] #320
Deputy Sheriff (Signature) Badge #

Electronically Filed - Jackson - Kansas City - March 19, 2015 - 09:24 AM

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Principal of Southeast Early College Campus

SERVE:
33630 County Highway 1
UNDERWOOD, MN 56586

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

05-MAR-2015
Date

______________________ Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ____________________ of ____________ County, ____________ (state).
3. I have served the above summons by: (check one)
   - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
   - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ____________________, a person of the Defendant's/Respondent's family over the age of 15 years.
   - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ____________________ (name) ____________________ (title).
   - ☐ other (describe) ____________________.

Served at ____ (address)
in ____________ County, ____________ (state), on ____________ (date) at ____________ (time).

______________________ Printed Name of Sheriff or Server

______________________ Signature of Sheriff or Server

Subscribed and Sworn To me before this ________ (day) ________ (month) ________ (year)

I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

______________________ Signature and Title

Service Fees, if applicable

Summons	$__________
Non Est	$__________
Mileage	$__________ (__________ miles @ $ ______ per mile)
Total	$__________

See the following page for directions to clerk and to officer making return on service of summons.

RECEIVED
MAR - 9 2015
OTTER TAIL COUNTY
SHERIFF'S OFFICE

Electronically Filed - Jackson - Kansas City - March 19, 2015 - 09:24 AM

STATE OF MINNESOTA)
) **ss.**
COUNTY OF OTTER TAIL)

CERTIFICATE OF
UNSERVED PROCESS
Court File #: 1516-CV04545

KATIE MOORE vs. **KANSAS CITY PUBLIC SCHOOLS**

I, Deputy Robert Huckeby, do hereby certify that on March 9, 2015, I received the following to serve on Dr. Edwin Richardson, ind & as Principal of Southwest Early College Campus

Summons w/Service Information-Attorney
Petition for Damages
Application for Appointment of Next Friend
Order Appointing Next Friend

The attached process is returned for the following reason(s)

Unable to locate - had phone contact with Jan Wilson (Edwin Richardson's step-daughter) who stated the Edwin Richardon that used to live at 33630 Co Hwy 1, Underwood, is deceased and never worked at Southwest Early College Campus.

Sheriff's Fees:

Service Fee	$ 25.00
Mileage	$ 19.80
Total	$ 44.80

Brian I. Schlueter, Sheriff
Otter Tail County Sheriff's Office
417 S Court St
Fergus Falls, MN 56537
218-998-8524

Dated: March 13, 2015

By: [signature] #320
Deputy Sheriff (Signature) Badge #

Electronically Filed - Jackson - Kansas City - March 19, 2015 - 09:24 AM

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET, DOLLAR, BURNS & BECKER, 1100 MAIN ST, SUITE 2600, KANSAS CITY, MO 64105
vs.	
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th, KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Principal of Southeast Early College Campus

SERVE:
33630 County Highway 1
UNDERWOOD, MN 56586

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

05-MAR-2015 ____________________
Date Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ____________ of ____________ County, ____________ (state).
3. I have served the above summons by: (check one)
   - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
   - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ____________, a person of the Defendant's/Respondent's family over the age of 15 years.
   - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ____________ (name) ____________ (title).
   - ☐ other (describe) ____________.

Served at ____________ (address)
in ____________ County, ____________ (state), on ____________ (date) at ____________ (time).

____________ Printed Name of Sheriff or Server
____________ Signature of Sheriff or Server

Subscribed and Sworn To me before this ____________ (day) ____________ (month) ____________ (year)

I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

____________ Signature and Title

Service Fees, if applicable

Summons	$____________
Non Est	$____________
Mileage	$____________ (____________ miles @ $ ________ per mile)
Total	$____________

See the following page for directions to clerk and to officer making return on service of summons.

RECEIVED
MAR - 9 2015
[COUNTY] JAIL COUNTY SHERIFF'S OFFICE

OSCA (7-04) SM60 (JAKSMOS) *For Court Use Only:* **Document ID# 15-SMOS-253** 1 of 2 **(1516-CV04545)** Rules 54.06, 54.07, 54.14, 54.20; 506.500, 506.510 RSMo

Electronically Filed - Jackson - Kansas City - March 20, 2015 - 02:54 PM

DOLLAR
BURNS &
BECKER LC
TRIAL ATTORNEYS

1100 Main Street | Suite 2600 | Kansas City, Missouri 64105
www.dollar-law.com | O: 816.876.2600 FX: 816.221.8763 TOLL-FREE: 877.816.2600

ASHLEY L. RICKET
Attorney
ashley@dollar-law.com

March 20, 2015

Clerk of the Circuit Court
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64106

Re: Katie Moore, as Next Friend on behalf of D.S., a minor v. Kansas City Public Schools, also known as the Kansas City Public School District, et al.
Case No.: 1516-CV04545

Dear Sir/Madam:

Please be advised that service of the requested Alias Summons for Dr. Edwin Richardson at his current place of employment, Viking Elementary School, 1 Viking Drive, Pelican Rapids, MN 56572, will be obtained by the following out of county Sheriff's Office:

Otter Tail County Sheriff
Attn: Civil Process
417 Court St. S.
Fergus Falls, MN 56537

Thank you for your assistance with this request.

Sincerely,

Ashley L. Ricket
ALR/llj

{315281.DOC}

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ AT KANSAS CITY ☐ AT INDEPENDENCE

RE: KATIE MOORE V KANSAS CITY PUBLIC SCHOOLS, ET AL
CASE NO: 1516-CV04545

TO: ASHLEY LYNN RICKET
DOLLAR, BURNS & BECKER
1100 MAIN ST, SUITE 2600
KANSAS CITY, MO 64105

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on March 19, 2015. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE
- ☒ ***Additional service instructions are needed.***
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)
- ☐ Need Circuit Court Form 4

RULE 5.6 – COLLECTIONS OF DEPOSIT
- ☐ No fee, or incorrect fee, received; fee required is $______.
- ☐ Insufficient Filing Fee; Please Remit $______
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1
- ☐ Need Circuit Court Form 17

RULE 68.7 – VITAL STATISTICS REPORT
- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT – FOREIGN JUDGMENT
- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS
- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER: To further process your request for summons regarding defendant-Dr. Edwin Richardson, the above marked box is needed, stating if service is to be obtained by an out of county sheriff's office, please state the name and address of that office; or if service is to be obtained by Private Process Server, a Motion and Order is needed listing the server(s) name and 2015 PPS#.**

***Please refer to the Court's website for server(s) correct name and number.**

- ☒ Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date _________. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed MARCH 20, 2015 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

MARCH 20, 2015
Date

By Myrtis Hawkins
Myrtis Hawkins (816) 881-6483
Deputy Court Administrator
☒ 415 East 12th St., Kansas City, Missouri 64106
☐ 308 W. Kansas, Independence, Missouri 64050

4/8

RECEIVED CIVIL PROCESS
15 MAR -4 AM 11:24

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: KANSAS CITY PUBLIC SCHOOLS, A/K/A THE KANSAS CITY PUBLIC SCHOOL DISTRICT

SERVE: AMY STOVALL
LEGAL SERVICES DEPARTMENT
1211 MCGEE
KANSAS CITY, MO 64106

MKE

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

CORPORATION/PARTNERSHIP – OFFICER/AGENT/PARTNER

I certify that I have served the within summons in Jackson County, Missouri, upon the within named defendant corporation Kansas City Public Schools, by delivering a copy of the summons and a copy of the petition to Shana Long, Senior Staff Attorney who said he/she was Officer.

Place of service: 1211 McGee, Kansas City MO
Date of service: 3/20/15
Time of service: 10:10AM

CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
LEGAL DEPARTMENT
UNIT OF SERVICE & JUDGMENT ENFORCEMENT

By ______________
DEPUTY

CIRCT 3032 – 2/12

Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$ (miles @ $. per mile)
Total	$

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE **vs.**	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Principal of Southeast Early College Campus

P.O.E.
VIKING ELEMENTARY SCHOOL
1 VIKING DRIVE
PELICAN RAPIDS, MN 56572

COURT SEAL OF
CIRCUIT COURT OF MISSOURI
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

23-MAR-2015
Date

____
Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ____________________ of ____________ County, ____________ (state).
3. I have served the above summons by: (check one)
   - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
   - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ________________, a person of the Defendant's/Respondent's family over the age of 15 years.
   - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ____________________ (name) ____________________ (title).
   - ☐ other (describe) ________________________________.

Served at ________________________________ (address)
in ____________ County, ____________ (state), on ____________ (date) at ____________ (time).

______________________ Printed Name of Sheriff or Server

______________________ Signature of Sheriff or Server

Subscribed and Sworn To me before this ________ (day) ________ (month) ________ (year)

I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

____
Signature and Title

Service Fees, if applicable

Summons	$__________
Non Est	$__________
Mileage	$__________ (________miles @ $ ______ per mile)
Total	**$__________**

See the following page for directions to clerk and to officer making return on service of summons.

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

SUMMONS/GARNISHMENT SERVICE PACKETS
ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

4/28

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	Case Number: 1516-CV04545
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

RECEIVED CIVIL PROCESS
15 MAR -4 AM 11: 24

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CECIL ANNETTE BILLUPS
Individually and as a Special Education Teacher at Southwest Early College Campus

SERVE:
8602 ELM AVENUE
RAYTOWN, MO 64138 Teller

COURT SEAL OF
CIRCUIT COURT OF MISSOURI
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

Further Information:

PERSONAL SERVICE

I hereby certify that I have served the within summons in Jackson County, Missouri, by delivering a copy of the summons and a copy of the petition to the within named defendant Cecil Annette Billups.

Place of Service 6512 Wornall Rd KCMO

Date of Service 3-30-15

Time of Service 1034 AM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

BY _______________ DEPUTY

CIRCT 3028- 12/13

Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$ (____ miles @ $.____ per mile)
Total	$

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

4/8

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

RECEIVED CIVIL PROCESS
15 MAR -4 AM 11:24

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ALICE COODY
individually and as a Special Education Teacher at
Southwest Early College Campus

SERVE:
822 E. 93RD TERRACE, APT. 322
KANSAS CITY, MO 64131 Antonyo

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

Further Information:

MEMBER OF FAMILY

I hereby certify that I have served the within summons in Jackson County, Missouri, by delivering a copy of the summons and a copy of the petition at the dwelling place or usual place of abode of the within named defendant, Alice Coody, by leaving with, Isaan Stanton (Son), a member of his/her family over the age of 15 years.

Place of Service 822 E 93rd Terr. Apt 322 KCMO

Date of Service 3-30-15

Time of Service 11:35 AM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

BY ____________________
DEPUTY

CIRCT 3029- 12/13

Summons	$
Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$ (miles @ $. per mile)
Total	$

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

4/2

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

RECEIVED CIVIL PROCESS
15 MAR -4 AM 11:24

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: SOUTHWEST EARLY COLLEGE CAMPUS, A/K/A SOUTHWEST HIGH SCHOOL

SERVE: ARCHIE BROWN, PRINCIPAL
6512 WORNALL ROAD
KANSAS CITY, MO 64113 Antonyo

COURT SEAL OF CIRCUIT COURT OF MISSOURI *JACKSON COUNTY*

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

Further Information:

CORPORATION - PERSON IN CHARGE

I certify that I have served the within summons in Jackson County, Missouri, upon the within-named defendant corporation, S. W. Early college Campus AKA S. W High School, by leaving a copy of the summons and a copy of the petition at the business office of said defendant corporation with Archie Brown (Pricipal), who said he/she was the person in charge thereof.

Place of service: 6512 Wornall Rd KCMO

Date of service: 3-30-15

Time of service: 1035AM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

BY________________
DEPUTY

CIRCT 3033- 12/13

Sheriff's Deputy Salary		
Supplemental Surcharge	$ 10.00	
Mileage	$______	(____ miles @ $.____ per mile)
Total	$______	

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

STATE OF MINNESOTA)
) ss.
COUNTY OF OTTER TAIL)

CERTIFICATE OF SERVICE OF PROCESS
Court File # 1516-CV-04545

KATIE MOORE OBO D.S., A MINOR vs. KANSAS CITY PUBLIC SCHOOLS, ET AL

Deputy Michael F. Brown, does hereby certify that on the 31st day of March, 2015 at 1025 hours at 1 Viking Dr, Pelican Rapids, County of Otter Tail, State of Minnesota, I duly served the following:

Summons for Personal Service Outside the State of Missouri
Petition for Damages
Application for Appointment of Next Friend
Order Appointing Next Friend

upon the following party: Edwin Richardson, ind & as a Principal of Southeast Early College Campus

☒ by personally leaving a copy with Edwin Richardson

☐ by leaving a true and correct copy thereof for _____ at _____ house of usual abode with one _____, a person of suitable age and discretion then residing therein

Sheriff's Fees:

Service Fee	$30.00
Mileage	$25.30
Total	$55.30

Dated: March 31, 2015

Brian I. Schlueter, Sheriff
Otter Tail County Sheriff's Office
417 S Court St
Fergus Falls, MN 56537
218-998-8524

By: Michael F Brown 335
Deputy Sheriff (Signature) Badge #

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**	
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105	
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106	
Nature of Suit: CC Pers Injury-Other		(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Prinicipal of Southeast Early College Campus

P.O.E.
VIKING ELEMENTARY SCHOOL
1 VIKING DRIVE
PELICAN RAPIDS, MN 56572

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

23-MAR-2015 ______ Clerk
Date

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ____________ of ____________ County, ____________ (state).
3. I have served the above summons by: (check one)
   - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
   - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ____________, a person of the Defendant's/Respondent's family over the age of 15 years.
   - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ____________ (name) ____________ (title).
   - ☐ other (describe) ____________.

Served at ____________ (address)
in ____________ County, ____________ (state), on ____________ (date) at ____________ (time).

Michael E. Brown — Printed Name of Sheriff or Server
[signature] 335 — Signature of Sheriff or Server

Subscribed and Sworn To me before this ______ (day) ______ (month) ______ (year)

I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

____________ Signature and Title

Service Fees, if applicable

Summons	$ ______
Non Est	$ ______
Mileage	$ ______ (______ miles @ $ ______ per mile)
Total	$ ______

See the following page for directions to clerk and to officer making return on service of summons.

RECEIVED
MAR 3 0 2015
OTTER TAIL COUNTY SHERIFF'S OFFICE

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

RECEIVED
MAR 30 2015
OTTER TAIL COUNTY
SHERIFF'S OFFICE

STATE OF MINNESOTA)
) **ss.**
COUNTY OF OTTER TAIL)

CERTIFICATE OF SERVICE OF PROCESS
Court File # 1516-CV-04545

KATIE MOORE OBO D.S., A MINOR vs. KANSAS CITY PUBLIC SCHOOLS, ET AL

Deputy Michael F. Brown, does hereby certify that on the 31st day of March, 2015 at 1025 hours at 1 Viking Dr, Pelican Rapids, County of Otter Tail, State of Minnesota, I duly served the following:

Summons for Personal Service Outside the State of Missouri
Petition for Damages
Application for Appointment of Next Friend
Order Appointing Next Friend

upon the following party: Edwin Richardson, ind & as a Principal of Southeast Early College Campus

☒ by personally leaving a copy with Edwin Richardson

☐ by leaving a true and correct copy thereof for _____ at _____ house of usual abode with one _____, a person of suitable age and discretion then residing therein

Sheriff's Fees:

Service Fee	$30.00
Mileage	$25.30
Total	$55.30

Dated: March 31, 2015

Brian I. Schlueter, Sheriff
Otter Tail County Sheriff's Office
417 S Court St
Fergus Falls, MN 56537
218-998-8524

By: [signature] 335
Deputy Sheriff (Signature) Badge #

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	Case Number: 1516-CV04545
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)

The State of Missouri to: EDWIN RICHARDSON
individually and as a Prinicipal of Southeast Early College Campus

P.O.E.
VIKING ELEMENTARY SCHOOL
1 VIKING DRIVE
PELICAN RAPIDS, MN 56572

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

23-MAR-2015 Date

Clerk

Further Information:

Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is ______ of ______ County, ______ (state).
3. I have served the above summons by: (check one)
   - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
   - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______, a person of the Defendant's/Respondent's family over the age of 15 years.
   - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to ______ (name) ______ (title).
   - ☐ other (describe) ______.

Served at ______ (address)
in ______ County, ______ (state), on ______ (date) at ______ (time).

Michael F. Brown — Printed Name of Sheriff or Server

______ 335 — Signature of Sheriff or Server

Subscribed and Sworn To me before this ______ (day) ______ (month) ______ (year)

I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

______ Signature and Title

Service Fees, if applicable

Summons	$______
Non Est	$______
Mileage	$______ (______ miles @ $______ per mile)
Total	$______

See the following page for directions to clerk and to officer making return on service of summons.

RECEIVED
MAR 3 0 2015
OTTER TAIL COUNTY SHERIFF'S OFFICE

OSCA (7-04) SM60 (JAKSMOS) *For Court Use Only*: **Document ID# 15-SMOS-330** 1 of 2 (1516-CV04545) Rules 54.06, 54.07, 54.14, 54.20; 506.500, 506.510 RSMo

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

RECEIVED
MAR 30 2015
OTTER TAIL COUNTY SHERIFF'S OFFICE

RECEIVED
MAR 3 0 2015
SHERIFF'S OFFICE

4/2

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

RECEIVED CIVIL PROCESS
15 MAR -4 AM 11:24
(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DR. R. STEPHEN GREEN
Alias:

SERVE: AMY STOVALL,
LEGAL SERVICES DEPT.
1211 MCGEE
KANSAS CITY, MO 64106 MIKE

COURT SEAL OF CIRCUIT COURT OF MISSOURI JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

03-MAR-2015
Date

Clerk

Further Information:

NON-EST

I certify that I have made a diligent search for and failed to find the within named defendant Amy Stovall C/O Dr. R. Stephen Green,
at 1211 McGee, Kansas City Mo,
for the reason that not at address

CIRCUIT COURT OF JACKSON COUNTY, MO
LEGAL DEPARTMENT
UNIT OF SERVICE & JUDGMENT ENFORCEMENT

4/2/15
Date

BY ____________
DEPUTY

CIRCT 3031 2/12

Summons $
Non Est $
Sheriff's Deputy Salary
Supplemental Surcharge $ 10.00
Mileage $ (____ miles @ $. ____ per mile)
Total $

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
☒ AT KANSAS CITY ☐ AT INDEPENDENCE

KATIE MOORE

PLAINTIFF,

VS.

CASE NO. 1516-CV04545; Div. 18

KANSAS CITY PUBLIC SCHOOLS, et al.,

DEFENDANTS.

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff in the above captioned matter and for its Motion for Approval/ Appointment of a Private Process Server, pursuant to Local Rule 4.9 of the Jackson County Circuit Court Rules, states to the Court as follows:

The Plaintiff requests that the following individual be approved and appointed to serve process in this case:

Legal Name: Greg Hulver

Registration No. PPS15-0025

The Plaintiff states that:

☐ The above-named individual is qualified to serve process in this matter and that an affidavit containing the information required by Rule 4.9 and attesting to such qualifications is attached and incorporated as Exhibit "A".

☒ The above-named individual is on the Court's List of Approved Process Servers and all of the information contained in his/her Application and Affidavit currently on file is still correct.

☐ The above-named individual is on the Court's List of Approved Process Servers and the information contained in his/her Application and Affidavit needs to be updated as indicated in an attachment, provided by me herewith.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
timd@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that Petitioner/ Plaintiff's Motion for Approval and Appointment of a Private Process server is sustained and the above-named individual is hereby approved and appointed to serve process in the above captioned matter.

______________________ DATE

______________________ JUDGE

DOLLAR
BURNS &
BECKER LC
TRIAL ATTORNEYS

1100 Main Street | Suite 2600 | Kansas City, Missouri 64105
www.dollar-law.com | O: 816.876.2600 FX: 816.221.8763 TOLL-FREE: 877.816.2600

ASHLEY L. RICKET
Attorney
ashley@dollar-law.com

April 7, 2015

Clerk of the Circuit Court
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64106

Re: Katie Moore, as Next Friend on behalf of D.S., a minor v. Kansas City Public Schools, also known as the Kansas City Public School District, et al.
Case No.: 1516-CV04545

Dear Sir/Madam:

Please consider this letter our written request for this Court to issue an **Alias Summons** as follows:

DR. R. STEPHEN GREEN, Superintendent of Kansas City Public Schools
SERVE: Amy Stovall, Legal Services Dept.
1211 McGee
Kansas City, MO 64106

We will obtain service on Defendant Green, through a court approved Private Process Server, Greg Hulver, PPS15-0025. Thank you for your assistance with this request.

Sincerely,

Ashley L. Ricket
ALR/llj

{316568.DOC}

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	**Case Number: 1516-CV04545**
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DR. R. STEPHEN GREEN
Alias:

SERVE: AMY STOVALL,
LEGAL SERVICES DEPT.
1211 MCGEE
KANSAS CITY, MO 64106

PRIVATE PROCESS SERVER

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

09-APR-2015
Date

____
Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______________________ a person of the Defendant's/Respondent's family over the age of 15 years.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

______________________ (name) ______________________(title).

☐ other ______________________.

Served at ______________________ (address)

in ______________ (County/City of St. Louis), MO, on ______________ (date) at ____________ (time).

______________________ Printed Name of Sheriff or Server

______________________ Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on ______________________ (date).

My commission expires: ______________ Date

______________________ Notary Public

Sheriff's Fees

Summons	$________
Non Est	$________
Sheriff's Deputy Salary	
Supplemental Surcharge	$ 10.00
Mileage	$________ (______ miles @ $.______ per mile)
Total	**$________**

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS
ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
☒ **AT KANSAS CITY** ☐ **AT INDEPENDENCE**

KATIE MOORE

PLAINTIFF,

VS.

CASE NO. 1516-CV04545; Div. 18

KANSAS CITY PUBLIC SCHOOLS, et al.,

DEFENDANTS.

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff in the above captioned matter and for its Motion for Approval/ Appointment of a Private Process Server, pursuant to Local Rule 4.9 of the Jackson County Circuit Court Rules, states to the Court as follows:

The Plaintiff requests that the following individual be approved and appointed to serve process in this case:

Legal Name: Greg Hulver

Registration No. PPS15-0025

The Plaintiff states that:

☐ The above-named individual is qualified to serve process in this matter and that an affidavit containing the information required by Rule 4.9 and attesting to such qualifications is attached and incorporated as Exhibit "A".

☒ The above-named individual is on the Court's List of Approved Process Servers and all of the information contained in his/her Application and Affidavit currently on file is still correct.

☐ The above-named individual is on the Court's List of Approved Process Servers and the information contained in his/her Application and Affidavit needs to be updated as indicated in an attachment, provided by me herewith.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
timd@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that Petitioner/ Plaintiff's Motion for Approval and Appointment of a Private Process server is sustained and the above-named individual is hereby approved and appointed to serve process in the above captioned matter.

09-Apr-2015
DATE

DEPUTY COURT ADMINISTRATOR

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
☒ AT KANSAS CITY ☐ AT INDEPENDENCE

KATIE MOORE

PLAINTIFF,

VS.

CASE NO. 1516-CV04545; Div. 18

KANSAS CITY PUBLIC SCHOOLS, et al.,

DEFENDANTS.

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff in the above captioned matter and for its Motion for Approval/ Appointment of a Private Process Server, pursuant to Local Rule 4.9 of the Jackson County Circuit Court Rules, states to the Court as follows:

The Plaintiff requests that the following individual be approved and appointed to serve process in this case:

Legal Name: Gregory C. Seher

Registration No. PPS15-0189

The Plaintiff states that:

☐ The above-named individual is qualified to serve process in this matter and that an affidavit containing the information required by Rule 4.9 and attesting to such qualifications is attached and incorporated as Exhibit "A".

☒ The above-named individual is on the Court's List of Approved Process Servers and all of the information contained in his/her Application and Affidavit currently on file is still correct.

☐ The above-named individual is on the Court's List of Approved Process Servers and the information contained in his/her Application and Affidavit needs to be updated as indicated in an attachment, provided by me herewith.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
timd@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that Petitioner/ Plaintiff's Motion for Approval and Appointment of a Private Process server is sustained and the above-named individual is hereby approved and appointed to serve process in the above captioned matter.

____________________ DATE

____________________ JUDGE

DOLLAR
BURNS &
BECKER LC
TRIAL ATTORNEYS

1100 Main Street | Suite 2600 | Kansas City, Missouri 64105
www.dollar-law.com | O: 816.876.2600 FX: 816.221.8763 TOLL-FREE: 877.816.2600

ASHLEY L. RICKET
Attorney
ashley@dollar-law.com

April 13, 2015

Clerk of the Circuit Court
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64106

Re: Katie Moore, as Next Friend on behalf of D.S., a minor v. Kansas City Public Schools, also known as the Kansas City Public School District, et al.
Case No.: 1516-CV04545

Dear Sir/Madam:

We recently requested and received on April 9, 2015 a Summons for Private Process Server for Defendant Dr. R. Stephen Green as follows:

DR. R. STEPHEN GREEN, Superintendent of Kansas City Public Schools
SERVE: Amy Stovall, Legal Services Dept.
1211 McGee
Kansas City, MO 64106

Due to a conflict with Gregory Hulver, our original private process server, we will now obtain service on Defendant Green, through a court approved Private Process Server, Gregory Seher, PPS15-0189 (See, Order). If a new Summons is needed, please consider this our request for the issuance of same. Thank you for your assistance with this request.

Sincerely,

Ashley L. Ricket
ALR/llj
Enclosure

{316568.DOC}

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
☒ AT KANSAS CITY ☐ AT INDEPENDENCE

KATIE MOORE

PLAINTIFF,

VS.

CASE NO. 1516-CV04545; Div. 18

KANSAS CITY PUBLIC SCHOOLS, et al.,

DEFENDANTS.

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff in the above captioned matter and for its Motion for Approval/ Appointment of a Private Process Server, pursuant to Local Rule 4.9 of the Jackson County Circuit Court Rules, states to the Court as follows:

The Plaintiff requests that the following individual be approved and appointed to serve process in this case:

Legal Name: Gregory C. Seher

Registration No. PPS15-0189

The Plaintiff states that:

☐ The above-named individual is qualified to serve process in this matter and that an affidavit containing the information required by Rule 4.9 and attesting to such qualifications is attached and incorporated as Exhibit "A".

☒ The above-named individual is on the Court's List of Approved Process Servers and all of the information contained in his/her Application and Affidavit currently on file is still correct.

☐ The above-named individual is on the Court's List of Approved Process Servers and the information contained in his/her Application and Affidavit needs to be updated as indicated in an attachment, provided by me herewith.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
timd@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

{316892.DOC }

ORDER

It is hereby ordered that Petitioner/ Plaintiff's Motion for Approval and Appointment of a Private Process server is sustained and the above-named individual is hereby approved and appointed to serve process in the above captioned matter.

13-Apr-2015
DATE

DEPUTY COURT ADMINISTRATOR

{316892.DOC}

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ **AT KANSAS CITY**   ☐ AT INDEPENDENCE

RE: KATIE MOORE V KANSAS CITY PUBLIC SCHOOLS, ET AL
CASE NO: 1516-CV04545

TO: ASHLEY LYNN RICKET
DOLLAR, BURNS & BECKER
1100 MAIN ST, SUITE 2600
KANSAS CITY, MO 64105

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on April 10, 2015. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE
- ☒ **Additional service instructions are needed.**
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)
- ☐ Need Circuit Court Form 4

RULE 5.6 – COLLECTIONS OF DEPOSIT
- ☐ No fee, or incorrect fee, received; fee required is $______.
- ☐ Insufficient Filing Fee; Please Remit $______
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1
- ☐ Need Circuit Court Form 17

RULE 68.7 – VITAL STATISTICS REPORT
- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT – FOREIGN JUDGMENT
- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS
- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER: We received your Motion for Approval and Appointment of Private Process Server, file stamped on April 10, 2015. However, there were no service instructions included. Before your case can be processed further you will need to eFile service instructions indicating which defendant will be served.**

- ☒ **Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.**
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date ________. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed APRIL 13, 2015 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

APRIL 13, 2015
Date

By Peggy Holley
Peggy Holley, 816-881-6491
Deputy Court Administrator
☒ **415 East 12th St., Kansas City, Missouri 64106**
☐ **308 W. Kansas, Independence, Missouri 64050**

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
☒ AT KANSAS CITY ☐ AT INDEPENDENCE

KATIE MOORE

PLAINTIFF,

VS.

CASE NO. 1516-CV04545; Div. 18

KANSAS CITY PUBLIC SCHOOLS, et al.,

DEFENDANTS.

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff in the above captioned matter and for its Motion for Approval/ Appointment of a Private Process Server, pursuant to Local Rule 4.9 of the Jackson County Circuit Court Rules, states to the Court as follows:

The Plaintiff requests that the following individual be approved and appointed to serve process in this case:

Legal Name: Gregory C. Seher

Registration No. PPS15-0189

The Plaintiff states that:

☐ The above-named individual is qualified to serve process in this matter and that an affidavit containing the information required by Rule 4.9 and attesting to such qualifications is attached and incorporated as Exhibit "A".

☒ The above-named individual is on the Court's List of Approved Process Servers and all of the information contained in his/her Application and Affidavit currently on file is still correct.

☐ The above-named individual is on the Court's List of Approved Process Servers and the information contained in his/her Application and Affidavit needs to be updated as indicated in an attachment, provided by me herewith.

DOLLAR BURNS & BECKER, L.C.

Tim Dollar #33123
Ashley L. Ricket #59068
1100 Main Street, Suite 2600
Kansas City, MO 64105
timd@dollar-law.com
ashley@dollar-law.com
(816) 876-2600
(816) 221-8763 (Fax)
ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that Petitioner/ Plaintiff's Motion for Approval and Appointment of a Private Process server is sustained and the above-named individual is hereby approved and appointed to serve process in the above captioned matter.

13-Apr-2015

DATE

DEPUTY COURT ADMINISTRATOR

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	Case Number: 1516-CV04545
Plaintiff/Petitioner: KATIE MOORE	Plaintiff's/Petitioner's Attorney/Address: ASHLEY LYNN RICKET, DOLLAR, BURNS & BECKER, 1100 MAIN ST, SUITE 2600, KANSAS CITY, MO 64105
vs.	
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS,	Court Address: 415 E 12th, KANSAS CITY, MO 64106
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DR. R. STEPHEN GREEN
Alias:

SERVE: AMY STOVALL,
LEGAL SERVICES DEPT.
1211 MCGEE
KANSAS CITY, MO 64106

PRIVATE PROCESS SERVER

COURT SEAL OF
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

09-APR-2015
Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______ a person of the Defendant's/Respondent's family over the age of 15 years.

☑ (for service on a corporation) delivering a copy of the summons and a copy of the petition to AMY STOVALL (name) LEGAL (title).

☐ other ______.

Served at 1211 MCGEE (address)

in JACKSON / KANSAS CITY (County/City of St. Louis), MO, on 4/15/2015 (date) at 11:55AM (time).

GREG SEHER
Printed Name of Sheriff or Server

Signature of Sheriff or Server

ANNA SEHER
Notary Public - State of Kansas
My Appt. Expires 11-15-16
(Seal)

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 4-16-15 (date).

My commission expires: 11-15-16
Date

Notary Public

Sheriff's Fees	
Summons	$ 75
Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ ~~10.00~~
Mileage	$ 12.32 (22.4 miles @ $. 55 per mile)
Total	$ 87.32

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KEVIN DUANE HARRELL	Case Number: 1516-CV04545
Plaintiff/Petitioner: KATIE MOORE vs.	Plaintiff's/Petitioner's Attorney/Address ASHLEY LYNN RICKET DOLLAR, BURNS & BECKER 1100 MAIN ST SUITE 2600 KANSAS CITY, MO 64105
Defendant/Respondent: KANSAS CITY PUBLIC SCHOOLS, Nature of Suit: CC Pers Injury-Other	Court Address: 415 E 12th KANSAS CITY, MO 64106

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DR. R. STEPHEN GREEN
Alias:

SERVE: AMY STOVALL,
LEGAL SERVICES DEPT.
1211 MCGEE
KANSAS CITY, MO 64106

PRIVATE PROCESS SERVER

COURT SEAL OF

CIRCUIT COURT OF MISSOURI

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

09-APR-2015
Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with ______ a person of the Defendant's/Respondent's family over the age of 15 years.

☑ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

AMY STOVALL (name) LEGAL (title).

☐ other ______.

Served at 1211 MCGEE (address)

in JACKSON / KANSAS CITY (County/City of St. Louis), MO, on 4/15/2015 (date) at 11:55AM (time).

GREG SEHER
Printed Name of Sheriff or Server

Signature of Sheriff or Server

ANNA SEHER
Notary Public - State of Kansas
My Appt. Expires 11-15-16
(Seal)

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 4-16-15 (date).

My commission expires: 11-15-16
Date

Anna Seher
Notary Public

Sheriff's Fees	
Summons	$ 75
Non Est	$
Sheriff's Deputy Salary	
Supplemental Surcharge	$ ~~10.00~~
Mileage	$ 12.32 (22.4 miles @ $. 55 per mile)
Total	$ 87.32

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.